

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

In re:)	MJ-20-089-STE; MJ-20-148-STE; MJ-20-159-STE;
)	MJ-20-160-STE; MJ-20-162-STE; MJ-20-166-STE;
Unsealing Certain)	MJ-20-167-STE; MJ-20-172-STE; MJ-20-173-STE;
2020 Sealed Cases,)	MJ-20-178-STE; MJ-20-179-STE; MJ-20-180-STE;
With Restricted Access)	MJ-20-274-STE; MJ-20-275-STE; MJ-20-276-STE;
to Identified Documents)	MJ-20-277-STE; MJ-20-278-STE; MJ-20-281-STE;
)	MJ-20-282-STE; MJ-20-302-STE; MJ-20-303-STE;
)	MJ-20-317-STE; MJ-20-318-STE; MJ-20-321-STE;
)	MJ-20-389-STE; MJ-20-405-STE; MJ-20-410-STE;
)	MJ-20-411-STE; MJ-20-412-STE; MJ-20-413-STE;
)	MJ-20-423-STE; MJ-20-427-STE; MJ-20-428-STE;
)	MJ-20-432-STE; MJ-20-437-STE; MJ-20-523-STE;
)	MJ-20-524-STE; MJ-20-525-STE; MJ-20-526-STE;
)	MJ-20-527-STE; MJ-20-530-STE; MJ-20-531-STE;
)	MJ-20-532-STE; MJ-20-533-STE; MJ-20-534-STE;
)	MJ-20-535-STE; MJ-20-540-STE; MJ-20-541-STE;
)	MJ-20-549-STE; MJ-20-550-STE; MJ-20-551-STE;
)	MJ-20-553-STE; MJ-20-554-STE; MJ-20-555-STE;
)	MJ-20-577-STE; MJ-20-578-STE; MJ-20-626-STE;
)	MJ-20-628-STE
)	
)	<u>FILED UNDER SEAL</u>

**GOVERNMENT’S MOTION TO UNSEAL WITH RESTRICTED ACCESS TO
CERTAIN DOCUMENTS**

The United States moves the Court to unseal the above-referenced sealed cases from calendar year 2020, but with restricted access to the United States for certain documents within the cases. The above-referenced cases include sealed affidavits and warrants under Fed. R. Crim. P. 41 generally related to (1) defendants later publicly charged in this Court or (2) documents that—if unsealed, with the exceptions noted below—would not disclose sensitive information about victims, cooperators, investigative techniques, or uncharged conduct. The United States previously moved the

Court to seal each above-referenced case because a federal criminal investigation at that time was ongoing and disclosure of evidence, witness identities, or other information contained in the affidavit and warrant might have hampered that investigation. After reviewing the government's motion to seal, the Court ordered each case to be sealed when it authorized the warrant.

“Courts have long recognized a common-law right of access to judicial records.” *United States v. Bacon*, 950 F.3d 1286, 1292 (10th Cir. 2020) (quotation marks omitted). “Consistent with this presumption that judicial records should be open to the public, the party seeking to keep records sealed bears the burden of justifying that secrecy, even where, as here, the district court already previously determined that those documents should be sealed.” *Id.* at 1293 (quotation marks omitted). In connection with a comprehensive, individualized review of previously sealed matters with the Court, the United States has determined that sealing the entirety of the above-referenced cases is no longer necessary. However, certain documents within the above-referenced cases—such as the affidavit in support of a search warrant or seizure warrant—include sensitive information about victims, cooperators, investigative techniques, or uncharged conduct and should not be unsealed.

For the reasons described above, the United States moves (1) to unseal the following sealed cases and (2) to restrict access only to the United States for the below-identified documents within these cases:

	Case Number	Requested Documents with Restricted Access
1	MJ-20-089-STE	Docs. 1 (with affidavit), 2
2	MJ-20-148-STE	Doc. 1 (with affidavit)
3	MJ-20-159-STE	Doc. 1 (with affidavit)
4	MJ-20-160-STE	Doc. 1 (with affidavit)
5	MJ-20-162-STE	Doc. 1 (with affidavit)
6	MJ-20-166-STE	Docs. 1 (with affidavit), 5
7	MJ-20-167-STE	Docs. 1 (with affidavit), 3
8	MJ-20-172-STE	Doc. 1 (with affidavit)
9	MJ-20-173-STE	Doc. 1 (with affidavit)
10	MJ-20-178-STE	Doc. 1 (with affidavit)
11	MJ-20-179-STE	Doc. 1 (with affidavit)
12	MJ-20-180-STE	Doc. 1 (with affidavit)
13	MJ-20-274-STE	Docs. 1 (with affidavit), 2
14	MJ-20-275-STE	Docs. 1 (with affidavit), 2
15	MJ-20-276-STE	Docs. 1 (with affidavit), 2
16	MJ-20-277-STE	Docs. 1 (with affidavit), 2
17	MJ-20-278-STE	Doc. 1 (with affidavit)
20	MJ-20-281-STE	Doc. 1 (with affidavit)
19	MJ-20-282-STE	Doc. 1 (with affidavit)
20	MJ-20-302-STE	Doc. 1 (with affidavit)
21	MJ-20-303-STE	Doc. 1 (with affidavit)
22	MJ-20-317-STE	Doc. 1 (with affidavit)
23	MJ-20-318-STE	Doc. 1 (with affidavit)
24	MJ-20-321-STE	Doc. 1 (with affidavit)
25	MJ-20-389-STE	Doc. 1 (with affidavit)
26	MJ-20-405-STE	Doc. 1 (with affidavit)

	Case Number	Requested Documents with Restricted Access
27	MJ-20-410-STE	Doc. 1 (with affidavit)
28	MJ-20-411-STE	Doc. 1 (with affidavit)
29	MJ-20-412-STE	Doc. 1 (with affidavit)
30	MJ-20-413-STE	Doc. 1 (with affidavit)
31	MJ-20-423-STE	Doc. 1 (with affidavit)
32	MJ-20-427-STE	Doc. 1 (with affidavit)
33	MJ-20-428-STE	Doc. 1 (with affidavit)
34	MJ-20-432-STE	Doc. 1 (with affidavit)
35	MJ-20-437-STE	Doc. 1 (with affidavit)
36	MJ-20-523-STE	Doc. 1 (with affidavit)
37	MJ-20-524-STE	Doc. 1 (with affidavit)
38	MJ-20-525-STE	Doc. 1 (with affidavit)
39	MJ-20-526-STE	Doc. 1 (with affidavit)
40	MJ-20-527-STE	Doc. 1 (with affidavit)
41	MJ-20-530-STE	Doc. 1 (with affidavit)
42	MJ-20-531-STE	Doc. 1 (with affidavit)
43	MJ-20-532-STE	Doc. 1 (with affidavit)
44	MJ-20-533-STE	Doc. 1 (with affidavit)
45	MJ-20-534-STE	Doc. 1 (with affidavit)
46	MJ-20-535-STE	Doc. 1 (with affidavit)
47	MJ-20-540-STE	Doc. 1 (with affidavit)
48	MJ-20-541-STE	Doc. 1 (with affidavit)
49	MJ-20-549-STE	Doc. 1 (with affidavit)
50	MJ-20-550-STE	Doc. 1 (with affidavit)
51	MJ-20-551-STE	Doc. 1 (with affidavit)
52	MJ-20-553-STE	Doc. 1 (with affidavit)

	Case Number	Requested Documents with Restricted Access
53	MJ-20-554-STE	Doc. 1 (with affidavit)
54	MJ-20-555-STE	Doc. 1 (with affidavit)
55	MJ-20-577-STE	Doc. 1 (with affidavit)
56	MJ-20-578-STE	Doc. 1 (with affidavit)
57	MJ-20-626-STE	Doc. 1 (with affidavit)
58	MJ-20-628-STE	Doc. 1 (with affidavit)

The United States will provide to the Court a proposed order related to this motion.

Respectfully submitted,

ROBERT J. TROESTER
United States Attorney

s/Chris M. Stephens
CHRIS M. STEPHENS
Oklahoma Bar. No. 20345
210 West Park Avenue, Suite 400
Oklahoma City, Oklahoma 73102
(405) 553-8783 (office)
(405) 553-8888 (fax)
Chris.Stephens@usdoj.gov